

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

**IN RE: BLACKBAUD, INC.,  
CUSTOMER DATA SECURITY  
BREACH LITIGATION**

**Case No. 3:20-mn-02972-JFA**

**MDL No. 2972**

**JOINT STATUS REPORT**

Consistent with the Court's direction during the conference held on April 10, 2025, the Parties submit this Joint Status Report to apprise the Court of the status of their efforts to finalize the settlement agreements and other necessary documents.

Since the Parties notified the Court of the Parties' agreement in principle to settle this matter, the Parties have spent significant time drafting, exchanging, and discussing the Master and separate Individual Settlement Agreements required by this settlement. The Parties have exchanged numerous drafts of the settlement agreements and have reached agreement on all substantive elements. The only remaining work to be performed is the clarification of certain language contained in the settlement agreements and securing all necessary approvals of the finalized settlement agreements.

Given the schedules of counsel (including several who have been or are soon to be out of the country), and the number of approvals necessary to finalize the settlement agreements, the Parties respectfully request additional time to finalize the agreements. The Parties request that they have until June 30, 2025, to file a joint status report with the Court informing the Court of the

Parties' agreement as to a final set of the settlement agreements. Should the settlement agreements be finalized before June 30, 2025, the Parties will file a joint status report so informing the Court.

In addition, the Parties wish to advise the Court that they anticipate using a Qualified Settlement Fund ("QSF") pursuant to Treasury Regulation § 1.468B-1 to handle the distribution of the settlement proceeds in this matter, subject to Court approval and order establishing the fund. To that end, the Parties anticipate submitting a consent order for the Court's consideration.

Also, during the conference on April 10, 2025, the Parties advised the Court that Plaintiffs' counsel had been unable to contact Plaintiff, Heidi Atwood. Contact has still not been made with Plaintiff Atwood and a motion to dismiss her claims for lack of prosecution will be filed once the settlement documents are executed by all Parties. At this time, Plaintiffs' counsel is not aware of any other similarly situated Plaintiffs. Plaintiff Kathryn Mortensen filed a stipulation of dismissal on May 7, 2025.

The Parties respectively request that they be given until June 30, 2025, to provide the Court with a further joint status report.

Dated: June 10, 2025

Respectfully submitted,

/s/ Harper T. Segui

Harper T. Segui (Fed ID No. 10841)

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2025, the foregoing was filed using the Court's CM/ECF service, which will send notification of such filing to all counsel of record.

/s/ Harper T. Segui  
Harper T. Segui